

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BIOSAFE-ONE, INC. d/b/a  
WWW.BIOSAFEONE.COM  
and CHRISTOPHER JORGENSEN,

Case No.: 07 CV 6764 (DC)(DFE)

*Plaintiffs,*

-against-  
ROBERT HAWKS; BRAD SKIERKOWSKI;  
NEWTECHBIO, USA a/k/a BRAD & COMPANY,  
INC. d/b/a WWW.NEWTECHBIO.COM;  
WWW.JUMBOMORTGAGES101.COM  
a/k/a JUMBOMORTGAGES.NET; and  
BCI FUNDING GROUP,

*Defendants.*  
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**DECLARATION OF DARREN OVED, ESQ.**

Darren Oved, Esq., an attorney practice before the United States District Court for the Southern District of New York, does hereby declare under penalties of perjury that:

1. I am a member of the law firm of Oved & Oved LLP, attorneys for Plaintiffs and am fully familiar with the facts and circumstances relevant to this motion. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction, pursuant to Fed. R. Civ. P. 65(a).

2. A copy of Plaintiffs' Verified Complaint and Jury Demand (the "Verified Complaint") in this action, dated July 26, 2007, is annexed hereto as "**Exhibit A.**"

3. As stated in the Paragraph 1 of the Verified Complaint, Plaintiffs seek this relief after being victimized by the unlawful, fraudulent, unfair and unconscionable acts of Defendants, who used their position of trust to collect highly-sensitive confidential information from Plaintiffs, unlawfully and unfairly misappropriated that information in violation of their fiduciary

duties to Plaintiffs, repeatedly and willfully copied extensive intellectual property from Plaintiffs, repeatedly and fraudulently stole and impersonated Plaintiffs' corporate identity, and completely and unlawfully replicated Plaintiffs' unique, successful and pioneering website and business, thereby causing and continuing to cause serious irreparable harm to Plaintiffs' business, reputation, goodwill, trade name, trademarks, and ability to fairly compete in the marketplace.

4. Unless the Court intervenes and enjoins Defendants' ongoing unlawful conduct, Plaintiffs will continue to be irreparably harmed and Plaintiff Jorgensen risks losing his sole livelihood and business. Verified Complaint, ¶ 2.

5. No prior application has been made for the same or similar relief.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York  
August 6, 2007

A handwritten signature in black ink, appearing to read 'D Oved', is written over a horizontal line.

Darren Oved, Esq. (DO 9337)  
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